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April 1, 2022

VIA ECF FILING

Hon. Katherine Polk Failla  
United States District Judge  
For the Southern District of New York  
Thurgood Marshall United States Courthouse  
40 Foley Square, Courtroom 1105  
New York, NY 10007

**MEMO ENDORSED**

Re: Civil Action No. 1:21-cv-10769-KPF  
One World Filter Corporation v. Koslow Technologies Corporation, et al.

Dear Judge Failla:

We represent Defendants Koslow Technologies Corporation ("KT Corp.") and Evan Koslow ("Mr. Koslow") (collectively, "Koslow") in the above-referenced action. Koslow submits this letter motion pursuant to Local Civil Rule 5.2(b) and 7.1(d), as well as Individual Rules of Practice 9(B).

Pursuant to the Court's notice of Transcript of Proceedings (Doc. 28) Koslow respectfully moves the Court for an Order permitting it to submit requested redactions of the transcript of the proceedings before the Court held on March 11, 2022 to the Court Reporter for placement on the public docket with an unredacted version to be maintained under seal. The requested redactions are anticipated to be of information other than personal data identifiers outlined in Fed. R. Civ. P. 5.2 or Fed. R. Cr. P. 49.1.

Specifically, Koslow requests the Court maintain portions of certain pages of the transcript under seal (the "Designated Material"). Good cause exists to grant this letter-motion because the Designated Material contains sensitive and proprietary business information not available to the general public and designated as "Highly Confidential" by Koslow. The Designated Material is to be narrowly tailored consistent with the presumption in favor of public access to judicial documents.

Therefore, Koslow respectfully requests that the Court grant leave for the Court Reporter to file a redacted version of the above-referenced hearing transcript and that the unredacted transcript be maintained under seal. Koslow's Redaction / Correction<sup>1</sup> Request Form will be submitted to the Court Reporter by April 19, 2022 (*see* Doc. 28).

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "Chris Stankus", written over a horizontal line.

Christopher J. Stankus  
[cstankus@whipgroup.com](mailto:cstankus@whipgroup.com)

c: All Counsel (via ECF)  
Court Reporter (via email)

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<sup>1</sup> To correct one material typographical error on page 28 of the transcript.

Application GRANTED. The Clerk of Court is directed to maintain the unredacted transcript at docket number 28 under seal, visible to the Court and parties only.

Defendants Koslow Technologies Corporation and Evan Koslow are directed to submit their Redaction / Correction Request Form to the Court Reporter by April 19, 2022.

The Clerk of Court is further directed to terminate the pending motion at docket number 32.

Dated: April 4, 2022  
New York, New York

SO ORDERED.

A handwritten signature in blue ink, reading "Katherine Polk Failla".

HON. KATHERINE POLK FAILLA  
UNITED STATES DISTRICT JUDGE